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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

RICHARD KADREY, *et al.*,  
Individual and Representative Plaintiffs,  
v.  
META PLATFORMS, INC., a Delaware  
corporation;  
Defendant.

Case No. 3:23-cv-03417-VC-TSH

**DECLARATION OF LUKE ZETTLEMOYER**

Trial Date: None  
Date Action Filed: July 7, 2023

1 I, Luke Zettlemoyer, declare:

2       1. I am a Research Director for the Fundamental AI Research (FAIR) group at Meta  
 3 Platforms, Inc. I am also a Professor in the Allen School of Computer Science & Engineering at  
 4 the University of Washington. I declare that the following is true to the best of my knowledge,  
 5 information, and belief, and that if called upon to testify, I could and would testify to the following.

6       2. Tim Dettmers was employed part-time by Meta Platforms, Inc. (“Meta”) between  
 7 March 2020 and March 2022. His formal title was Visiting Researcher. At the time, Mr. Dettmers  
 8 was a Ph.D. student of mine at the University of Washington. I was also a Research Director at  
 9 FAIR, an organization within Meta focusing on AI research, and oversaw Mr. Dettmers’s work.

10      3. Meta requires all new employees (including part-time employees) to undergo  
 11 mandatory trainings, which include among other things training on the need to protect confidential  
 12 information and privileged communications from disclosure to persons outside the company. As a  
 13 part-time employee, Mr. Dettmers completed these trainings, including trainings titled “Legal.”  
 14 Mr. Dettmers’s role as Visiting Researcher did not include managerial responsibilities within Meta,  
 15 and he was not tasked with communicating with third parties regarding legal issues. He was, by  
 16 all accounts, a low-level and part-time employee and was not a part of Meta’s management.

17      4. I understand that a dispute has arisen concerning communications made by Mr.  
 18 Dettmers on two Discord channels operated by EleutherAI, a non-profit AI research lab. These  
 19 Discord communications, which I reviewed after this dispute arose, directly describe legal advice  
 20 that Mr. Dettmers and I received from in-house attorneys at Meta between December 2020 and  
 21 January 2021 relating to data that Meta was considering using for AI research. This legal advice  
 22 did not pertain to Meta’s Llama large language model (LLM), but related to a separate research  
 23 project with which I was also involved. I have had no involvement with any of Meta’s Llama  
 24 models.

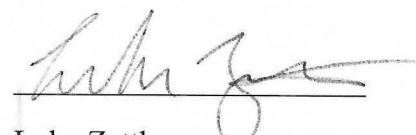
25      5. The legal advice was sought through Meta’s single review tool (SRT), which is a  
 26 centralized platform used by Meta employees to request and obtain legal review relating to various  
 27 projects at Meta, among other purposes. My understanding, based on using the SRT tool, is that  
 28 any Meta employee with an SRT account has access to the SRT tool, but only employees that have

1 been added to a particular SRT request are able to view the communications from the Meta  
 2 attorneys assigned to the request. In this case, Mr. Dettmers had access to the SRT request as a  
 3 member of the research team receiving the specific legal advice. Other than research team  
 4 members, only Meta's in house and outside counsel and two administrative employees that manage  
 5 SRT requests had access to the specific request underlying the Subject Communications.

6       6. I was not aware that Mr. Dettmers had disclosed the legal advice he had received on  
 7 the Discord platform until after December 2023, when I understand the Plaintiffs in this case filed  
 8 a "First Consolidated Amended Complaint" (FCAC) that I understand quoted from and made  
 9 reference to Mr. Dettmers's posts to the Discord platform. I am not aware of anyone at Meta, other  
 10 than Mr. Dettmers himself, who knew about the content of his Discord communications before the  
 11 filing of the FCAC. EleutherAI's Discord server is not a part of Meta's business, and there would  
 12 be no reason for Meta personnel to investigate it for unauthorized disclosures. Additionally, to the  
 13 best of my knowledge, no one on the team at Meta that received the legal advice, other than Mr.  
 14 Dettmers, disclosed it to anyone outside the company.

15       7. Mr. Dettmers and others on his team were not authorized by Meta to disclose the  
 16 legal advice they received from Meta's in-house lawyers with people outside the company and, in  
 17 fact, were prohibited from doing so. Nobody at Meta directed Mr. Dettmers to discuss or disclose  
 18 the legal advice he received with EleutherAI, or anyone else outside the company.

19       I declare under penalty of perjury that the foregoing is true and correct. Executed on this  
 20 27th day of June 2024 at Seattle, Washington.



Luke Zettlemoyer